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**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

RORY L. BUCKNER,

Plaintiff,

vs.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

Case No. 3:22-cv-00479-LRH-CLB

**ORDER GRANTING
 DEFENDANT UNION PACIFIC
 RAILROAD COMPANY'S
 UNOPPOSED MOTION FOR
 EXTENSION OF TIME TO
 FILE RESPONSIVE PLEADING
 (1ST REQUEST)**

Pursuant to Fed R. Civ. P. 6(b) and L.R. IA 6-1(a), Defendant Union Pacific Railroad Company ("UPRR") moves to extend the deadline to file its response to Plaintiff's Complaint by two weeks, to December 9, 2022. In making its unopposed motion, UPRR expressly preserves all Rule 12 defenses.

This motion is made in good faith and not for any improper purpose. UPRR requests an extension of the time to respond to the Complaint to allow more time to meet and confer with Plaintiff's counsel regarding the contents of the Complaint and potential pleading deficiencies therein. UPRR's counsel began efforts to meet and confer on Friday, November 18, 2022, but due to

scheduling conflicts and the Thanksgiving holiday, counsel do not anticipate completing their meet and confer until after UPRR's responsive pleading deadline, which is currently November 25, 2022. Counsel for Plaintiff has agreed to stipulate to a two-week extension to file a responsive pleading to allow the parties time to meet and confer regarding the contents of the Complaint. Filed herewith is a Declaration of Stephanie L. Quinn and attached as Exhibit 1 is correspondence with Plaintiff counsel regarding his agreement to stipulate to a continuance of the responsive pleading deadline for two-weeks.

Defendant UPRR respectfully requests that the Court grant this request for an extension of time to file a responsive pleading, to December 9, 2022.

DATED: November 22, 2022

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By: /s/ Stephanie L. Quinn

Stephanie L. Quinn

Attorneys for

UNION PACIFIC RAILROAD COMPANY

ORDER

IT IS SO ORDERED.

DATED: November 22, 2022


UNITED STATES MAGISTRATE JUDGE